EXHIBIT A

Excerpts from Deposition of Anna Bond

ANNA BOND PETER DELVECCHIA vs FRONTIER AIRLINES

December 10, 2019

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Anna Bond Palantiff, Iva. CASE BD. 2:13-CV-81312-KEX-NX Iva. CASE BD. 2:13-CV-81	1	UNITED STATES DISTRICT COURT	1	EXAMINATION	
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No. CASS 80. 2119-CV-01122-KID-MIX No. Maye 103	5	Plaintiff,	4	•	
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PROMITER ARLENSS, INC., et al.,	6	VB.) CASE NO. 2:19-CV-01322-KJD-NJK	5	Me Maria	103
Befendants.		9	_	MI. Maye	103
## Bolified State ##	7	FRONTIER AIRLINES, INC., et al,			
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25 Mascovitz with Esquire Denosition Solutions 1			24	the videographer. The court reporter is Shifra	
			25	Moscovitz with Esquire Deposition Solutions.	



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EXHIBIT ANNA BOND
PETER DELVECCHIA vs FRONTIER AIRLINES

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Page 35 1 we didn't have parts in it, though, what is the it 1 page titled human trafficking, right? you are referring to? 2 A. Yes. A. The whole action of deciding what to do, 3 Q. And it says January is national slavery moving the two, moving the child, just everything, 4 and human trafficking prevention month? 5 in general, the whole flight. 5 A. Yes. Q. And it's your belief that you and Chelsea 6 Q. Did you read this when it came out? 7 didn't have anything to do with any of that? 7 A. Yes. A. Nothing major, yes. 8 Q. And so you had read it prior to the flight Q. Okay. We are going to get into the 9 on March 28 of 2019? 9 10 details in just a bit. But I want to mark and 10 A. Yes. 11 identify a couple of other documents first. 11 Q. And it says there, if you suspect a 12 (Exhibit 3 was marked for passenger may be a victim of human trafficking, 13 first initiate nonthreatening conversation and ask identification.) 14 All right. The court reporter has targeted questions. Do you see that? 15 just given you what has been marked as your 15 A. Yes. deposition Exhibit Number 3. Do you recognize what Q. And the questions that they show you there 16 17 this is? 17 are first, ask where they are traveling, are they 18 A. No. going on vacation or visiting relatives. And then 19 Q. All right. Can you look under the the second bullet point is, ask where they are 20 descriptions, does any of that make any sense to staying, who will be meeting them, what they will be 21 you? 21 doing, et cetera. Do you see that? 22 A. Yes. 22 A. Yes. 23 Q. Okay. Do you understand what those 23 Q. Now, on March 28 of 2019, did you ask any 24 descriptions are? of those questions of the young man identified as A. Yes. 25 AD? 25 Page 34 Page 36 Q. And so would that be a record of all of 1 1 A. No. 2 the training that you have received from Frontier to Q. Okay. Is there a reason you didn't ask 2 3 date? him those questions? 4 A. Yes. 4 A. I was in charge of the front and they were 5 Q. And is it accurate? seated in the back of the aircraft. 6 A. Yes. 6 Q. So they were not your responsibility? 7 7 Okay. That's all I had on that. Thank A. The whole plane is all of our 8 you. 8 responsibility, but they were not in my section, no. 9 MR. MCKAY: Let's mark this as Exhibit 4, Q. Okay. So does it say somewhere on here 10 please, through six. that you are only to do that if the person is seated 11 in your section? (Exhibits 4-6 were marked for 11 12 identification.) 12 A. No. Q. All right. So I am going to ask you first 13 Q. Oh. So back to my question about why you 13 14 about what has been marked as Deposition Exhibit 4. didn't do it, why you didn't ask these questions 15 And have you ever seen that before? then, is your answer still because they were not in 16 A. Yes. 16 your section? Q. Okay. And it says in-flight flyer below 17 A. Yes. 17 it in smaller print, In-flight Biweekly Briefing 18 Q. Okay. I guess that makes it easy, the Memo 19-06, January 25, 2019. Have I read that 19 next question is, take note if traveling companion 20 accurately? or companions appears nervous or prevents the 21 A. Yes. child/person from answering questions or if their 22 Q. Okay. And what is the In-flight Flyer? 22 answers seem evasive, do you see that?

23

24

25

A. Yes.

A. Yes.



A. It's a flyer they send out with new

Q. Okay. And this one in particular copies a

information on safety regarding our job.

23

24

25

Q. All right. Did you do that on March 28th?

ANNA BOND COULA VA EDONTIED AIDLINES

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PETER DELVECCHIA vs FRONTIER AIRL	LINI	ES 37–4
Page 37	T	Page 3
1 Q. Okay. And is it your testimony that you	1	Q. What happened next?
2 made particular observations that are consistent	2	A. We had two volunteers move from the back
3 with this?	3	section and they agreed to move to the couple rows
4 A. Yes.	4	behind the exit row together.
5 Q. Okay. And what are those observations?	5	 Q. So since I know that the two that you
 A. When I was briefing the exit row. 	6	moved ended up in row 17, may I assume that the
7 Q. Yes.	7	volunteers came from row 17?
 A. He was seated in my exit row, he looked 	8	A. Yes, correct.
9 like a young child, so I did ask him what, how old	9	Q. Okay. And the exit row is row 13, right?
10 he was. He ended up being under age where you have	10	A. Yes.
11 to be 15 to sit in the exit row. And when I asked	11	Q. Okay. Now, just out of curiosity, why
12 him how old he was, he looked at the gentleman	12	didn't you move them to the empty row in the back?
13 sitting next to me, and the man had nodded, and then	13	A. We keep the back row opened for a lot of
14 the boy had answered.	14	medical conditions or just to have room for us.
5 Q. All right. And you found something	15	Q. For us, meaning?
6 untoward about that?	16	A. The flight attendants, the flight crew.
7 A. Yes, the way he looked up at the gentleman	17	Q. Don't you have your own seats?
8 just made it seem like he was asking permission to	18	A. Yes.
9 talk.	19	Q. But you need extra seats?
Q. All right. You had never seen anybody do	20	A. They are very uncomfortable.
21 that before?	21	Q. The seats they give you?
22 A. No.	22	A. Yes.
Q. You never seen a child do that before?	23	Q. So in order to have comfy seats you go to
24 A. No.	24	•
Q. You have had interaction in your other	25	A. Yes.
Page 38	-	Page 40
1 jobs with your children before, right?	1	Q. So it wasn't an option under your training
2 A. Yes.	2	to move Peter and AD to the back row?
Q. And you have had interaction in Frontier	3	A. Can you repeat the question?
4 with children, correct?	4	Q. So it wasn't an option for you to move
5 A. Yes.	5	these people from the exit row to the back row?
Q. And you are testifying that you have never	6	A. That was an option, yes.
7 seen a child look to the parent before answering a	7	 Q. So who's decision was it not to use that
8 question from you?	8	option, but to make two other people move?
9 A. Not	9	A. You know, but at that time it was my
MR. MAYE: Object to form.	10	decision to move them where, anywhere, but at that
A. Not a question that simple.	11	time I didn't know the back row was empty.
2 Q. I see. Okay. But he did answer you,	12	Q. Oh, why not?
3 right?	13	A. We didn't finish boarding, we haven't done
I4 A. Yes.	14	the cabin count yet.
5 Q. And he said 12?	15	Q. Okay.
16 A. Yes.	16	A. So when we do the cabin count, that's when
17 Q. All right. Was there anything unusual	17	we know where the empty seats are. So we like to
18 about that?	18	
10 A Not 40 mg	10	no we don't have to rade the personner count. And

19 A. Not 12, no.

20 Q. Okay. And but it did require him to be

21 reseated?

22

A. Yes.

Q. And you told him and his father that they

24 needed to be reseated?

25 A. Yes. 19 so we don't have to redo the passenger count. And

20 at that time I just ask for volunteers near the exit

21 row to move to the exit row.

Q. Just going back to your previous

23 testimony, didn't you just tell me that the back row

24 was always kept open for medical and comfy seats for

25 the flight attendants?



ANNA BOND

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PE	TER DELVECCHIA vs FRONTIER AIRL	.INI	ES		41–44
1	Page 41 MR. MAYE: Object to form.	1	than 151	?	Page 43
2	A. Not when it's a full flight, the customer	2	A. Y		
3	service agents try to keep the back row empty, but	3		Okay. And so right away you sa	aid
4	it is not always like that.	4		ng like young man, how old are	
5	Q. Okay. So you got some people to switch	5	A. Y		,
6	with them, the people came from row 17. And so	6	Q. (Okay. He looked at his father fo	ra
7	Peter and AD went back to row 17, right?	7		and then said to you, I am 12?	
8	A. Yes.	8	A. Y	•	
9	Q. All right. Did anything unusual happen at	9	Q. 5	So then you reseated them, and	then you
10		10		r briefing?	•
11	A. No.	11	Å. `	-	
12	Q. Okay. So everything looked fine from that	12	Q.	So you didn't have any interacti	on with
13	point on?	13	the other	er passengers in 12 and 13?	
14	A. Yes.	14	A. 1	Not at that time.	
15	Q. Okay. So the only thing that was of	15	Q.	Okay. Where was Peter seated	in 13?
16	concern to you was the fact that AD had looked at	16	A. I	He was sitting in 13 Echo.	
17	Peter before giving his age?	17	Q.	So that is the middle seat on air	craft
18	MR. MAYE: Object to form.	18	right?		
19	A. At that time, it didn't occur to me it was	19	Α. `	Yes.	
20	a weird behavior, it kind of seemed strange, but I	20	Q. /	And where was AD seated?	
21	didn't take anything of it. So later on it kind of	21	Α. ٦	Thirteen Delta.	
22	clicked in my head that that was a really strange	22		Okay. The aisle seat?	
23	behavior.	23	A. \	Yes.	
24		24	Q. 1	Who was in 13 Foxtrum?	
25	A. What do you mean, sorry?	25	A. I	don't recall.	
	Page 42	_	0 0	and the state of t	Page 44
1	Q. Well, you said that at the time it	1		o you recall whether that was a wi	nite
2	happened it didn't even register, right?	2		black person?	
3	A. Well, at the time it was weird, I did see	3		lon't recall.	
4	something off, but it didn't really, it wasn't	4		o you recall whether AD was a wh	lite
5	enough for me to go tell the rest of the flight crew	5		a black person?	
6	what he just did.	6		pelieve he is black. nd what about Peter?	
7	Q. Okay. Now, as you look at, let me take	7		e is white.	
8	you through your briefing first, you went back to the exit row, row 13 to brief the passenger seated	8		s is writte. kay. So you remember seeing a v	white man
	there, right?	10		ack child?	Willie Illaii
11	A. Yes.	11		saw this, yes, physically, yes.	
12	Q. Is that the only exit row on this	12		okay. And you thought it was odd	when the
13	airplane?	13		Id looked at the white male?	WIICH LIIC
14	A. 12 and 13.	14		R. MAYE: Object to form.	
15	Q. 12 and 13 both. So you were the person	15		didn't find it odd that any race, tha	t
16	that came back and kind of in a raised voice said,	16		ally occur to me, it was just a boy a	
17	hey, everybody in rows 12 and 13, I need your	17		id the boy looked like he was aski	
18	attention, right?	18		on to talk.	ن
19	A. Yes.	19	-	okay. But that's not something that	t
20	Q. Did you do that?			cked you said until later?	
1	-		-	÷	

22 Q. Oh. 23 A. I had moved them before briefing. Q. I see. So before you even did the 24 25 briefing, you noticed that he appeared to be younger 25

MR. MAYE: I am sorry, object to form. She said that she did.

24

Q. How much later?

A. Yes.

21

22

23

MR. MCKAY: Object to form was great.



21

A. No.

ANNA BOND PETER DEL VECCHIA VS ERONTIER AIRLINES

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PETER DELVECCHIA vs FRONTIER AIRI	INES	4548
Page 45		Page 47
1 MR. MAYE: Well, you just mischaracterized	1 Chelsea?	
2 her testimony. That's all.	2 A. Yes.	
3 MR. MCKAY: Object to form works.	3 Q. Okay. Chelsea was the A	and you were the
4 MR. MAYE: Object to form.	4 C, correct?	
5 Q. Okay. Go ahead?	5 A. Yes.	
6 A. When I told the other crew members when	6 Q. Is that right, or B?	
7 Chelsea had walked through the cabin and saw the man	7 A. I was the C, yes.	
8 caressing the little boy's face.	8 Q. You were the C. Okay, le	-
9 Q. Okay. That occurred after the plane had	9 notes are right on that. Okay, yo	•
10 taken off, right?	10 Chelsea was the A, Scott Warre	
11 A. Yes.	11 Bond, you were the C, and Ama	nda Nichol was the D?
12 Q. So between the time you reseated them and	12 A. Yes.	
13 after the plane took off and Chelsea made an	13 Q. Okay. So the first time th	
14 objection, nothing had clicked at that point?	14 together to discuss Peter and Al) is after Chelsea
15 A. No.	15 makes an observation?	
 Q. Okay. So the clicking, as you testified, 	16 A. Yes.	
17 occurred after Chelsea said something to you?	17 Q. And at this point the flight	t is already up
 A. When Chelsea had told the crew, yes. 	18 in the air?	
19 Q. Okay. When you say told the crew, do you	19 A. Yes.	
20 mean the cockpit crew?	20 Q. Has service occurred?	
21 A. The flight attendants.	21 A. I believe it was after servi	ce.
22 Q. The other flight attendants?	22 Q. Okay. Can you give an e	
23 A. Yes.	23 many minutes into the flight you	were at that point?
24 Q. Including you?	24 A. If I were to estimate, we u	usually start
25 A. Yes.	25 service around 20 minutes after	take off. So if it
Page 46	4 Cinha minhah tal	Page 48
1 Q. So where did that event occur where all	1 was a busy flight, might have tak	
2 four of you, I presume, were together?	2 after that, but I don't recall if it was	
3 A. I believe it was in the forward galley.	3 not. If it's quick it ends in five mi	
4 Q. Okay. Why were the four flight attendants	4 obviously it could have been from	n 20 to 35 to 40
5 in the forward galley at that time?	5 minutes.	4:
6 A. When we want to talk about something	6 Q. Okay. That's right, on Fro	ontier
7 strange or what we saw, we do come to one galley,	7 everything is for sale, right?	
8 so.	8 A. Yes.	
9 Q. I am sorry, you say this is a sort of a	9 Q. So on a quick flight it may	/ be that nobody
10 routine, is this something that's told to you in	10 wants to buy anything?	
11 training or just something that happens and it's	11 A. Yes.	
12 just the way things are done?	12 Q. That's why it can finish, s	so quickiy?
A. It's just something that happens, and it's	13 A. Yes.	
14 just the way things are done.	14 Q. But you don't recall on th	•
Q. Okay. So who of the four of you said they	15 some point after service was over	
16 wanted to talk about something strange?	16 informed you that she wanted ta	ik to everybody
17 A. Chelsea.	17 together?	
18 Q. Okay. And how did she do that, how did	18 A. Yes.	
19 she communicate that to the rest of you?	19 Q. Okay. And then what ha	ppenea?

- A. I don't remember the whole conversation.
- 21 Q. All right. Well, I mean presumably you
- 22 all are working in different parts of the airplane
- 23 normally, right?

20

24

25

- A. Right.
- Q. So you were working in the same area as

- a
- 20 A. I believe when we all got together, Amanda
- 21 had saw something strange or felt something strange
- 22 about those two. I am not entirely sure the whole,
- 23 how the whole conversation went, but I remember all
- 24 of us at one point didn't feel good about those two.
- 25 Q. Okay. And you mentioned earlier it was



ANNA BOND PETER DELVECCHIA vs FRONTIER AIRLINES

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Page	1
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- 1 Chelsea's observation of something with respect to
- 2 the face, is that correct?
- 3 A. Yes.
- 4 Q. What did Chelsea say she had seen that
- 5 made her uncomfortable?
- 6 A. I am not sure what her exact words were,
- 7 but I think it was caressing of the face.
- 8 Q. Okay. So Chelsea said I saw the adult
- 9 caressing the child's face?
- 10 A. Yes.
- 11 Q. Anything more, anymore detail of any kind?
- 12 A. I don't know.
- 13 Q. Might have been?
- 14 A. Might have been.
- 15 Q. All right and then what happened or what
- 16 was said after that?
- 17 A. I don't remember.
- 18 Q. But you think you remember other people
- 19 chiming in with observations?
- 20 A. Yes.
- 21 Q. Who?
- 22 A. It was Amanda, and then at one point Scott
- 23 had saw something else.
- 24 Q. Okay. At that, during that same meeting?
- 25 A. It was, yes, during the same meeting, yes.

- 1 12 and not able.
- 2 Q. Yes.
- 3 A. Amanda had mentioned that she thought I
- 4 was moving them because of language issues, not
- 5 because he was 12.
 - Q. Had she spoken with them?
- 7 A. No.

6

11

- 8 Q. So she had just looked at them and
- 9 determined that they spoke a different language?
- 10 A. Yes.
 - Q. Okay. Did she say why?
- 12 A. The little boy did seem a lot older in the
- 13 face.
- 14 Q. Excuse me, if that doesn't connect up with
- 15 what we were just talking about. The little boy
- 16 seemed older in the face, therefore she thought he
- 17 spoke a different language?
- 18 A. Yes, so we have requirements on why we
- 19 have to move them. If they are old enough and they
- 0 are willing and able, it's usually a language
- 21 barrier where they are not able to speak English, so
- 22 we do have to move them, so a lot of the times it's
- 23 either age or language.
- Q. I see. So she was communicating to you, I
 - thought it was a language issue because I thought he

Page 50

- 1 Q. Why do you say at one point Scott had
- 2 seen?
- 3 A. Because the whole meeting took a few
- 4 minutes. This is when we had the pilots involved
- 5 after we all talked about it, this is when we had
- 6 the pilot involved.
- 7 Q. So now the pilots are involved as well?
- 8 A. Yes. So the whole meeting took place
- 9 pretty quickly, but it was like the flight
- 10 attendants talking, and then as we were talking we
- 11 got the pilots involved.
- 12 Q. Okay. So all of this is precipitated by
- 13 Chelsea's mentioning of the face, and convening
- 14 immediately, so far so good, correct?
- 15 A. So Chelsea seeing the caressing of the
- 16 face, and then that's when I had told them about
- 17 what I had seen, when I was at the exit row, and
- 18 then Amanda had mentioned that she didn't, she saw
- 19 something off with those two, like during the, when
- 20 I had initially moved them. After I had moved them
- 21 I walked to the back of the cabin to tell Scott and
- 22 Amanda why I had to move the two passengers out of
- 23 the exit row.
- 24 Q. Okay.
- 25 A. I had told them it was because the boy was

- 1 was over 15?
- 2 A. Yes.
- 3 Q. I see. And that's what you understand her
- 4 to mean?
- 5 A. Yes.
- 6 Q. So really the sequence of events, you
- 7 determined that he is 12, you moved them, you go
- 8 back to talk to Amanda and Scott to say, hey, I
- 9 moved them and here is why. So far right?
- 10 A. Yes.
- 11 Q. And Amanda said, oh, it was age, not
- 12 language?
 - A. Yes.
- 14 Q. Did Scott say anything at that point?
 - A. No.
- 16 Q. Is that the end of the conversation about
- 17 that?

13

15

18

- A. Yes.
- 19 Q. So then you go back to your station at the
 - front of the plane?
- 21 A. Yes.
- 22 Q. Okay. And then the plane takes off and
- 23 service occurs?
- 24 A. Yes.
- 25 Q. Am I missing anything important in that?



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